

Department of Integrated Services for Individuals with Disabilities

Dipåttamenton Prugrama Para I Maninutet Government of Guam



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To: Joint Guam Program Office Forward

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Santa Rita, Guam 96915

Office of the Governor of Guam

Attn: Military Buildup Office (Mark Calvo) Ricardo J. Bordallo Governor's Complex

Adelup, Guam 96910

Subject: Department of Integrated Services for Individuals with Disabilities (DISID) Input /

Comment on the Draft Supplemental Environmental Impact Statement (SEIS)

I have reviewed the Draft Supplemental Environmental Impact Statement (SEIS) and wish to provide a summary of the impact to our Department based on the five socioeconomic categories analyzed in the Socioeconomic Impact Assessment Study (SIAS).

POPULATION CHANGE:

No substantial impacts are projected for DISID under this particular category.

ECONOMIC ACTIVITY:

The economic impacts from the Military Relocation would be beneficial, leading to increased employment opportunities especially for veterans and individuals with disabilities.

The U.S. Department of Labor's Office of Federal Contract Compliance Programs (OFCCP) published Final Rules that makes changes to the regulations implementing the **Vietnam Era Veterans' Readjustment Assistance Act, as amended (VEVRAA)** at 41 CFR Part 60-300 and changes to the regulations implementing **Section 503 of the Rehabilitation Act of 1973, as amended (Section 503)** at 41 CFR Part 60-741.

VEVRAA requires employers doing business with the federal government to take affirmative action to recruit, hire and promote categories of veterans covered by the law, including veterans with disabilities and recently separated veterans (i.e., still within the three-year period beginning from the date of discharge or release from active duty) as well as those who served during a war, campaign or expedition for which a campaign badge is authorized.

Under **VEVRAA**, it is also illegal for these federal contractors and subcontractors to discriminate against protected veterans when making employment decisions on hiring, firing, pay, benefits, job assignments, promotions, layoffs, training and other employment related activities.

The **VEVRAA** rule requires federal contractors to establish an annual hiring bench mark-based on the national percentage of veterans in the civilian labor workforce (currently 7.2%) or based on the best available data and factors unique to their establishments (It is recommended that Contractors in Guam utilize Hawaii data).

Section 503 prohibits federal contractors and subcontractors from discriminating in employment against individuals with disabilities (IWDs), and requires these employers to take affirmative action to recruit, hire, promote, and retain these individuals.

The new **Section 503** regulations became effective on March 24, 2014 and established a nationwide 7% utilization goal for the employment of qualified individuals with disabilities. Contractors apply the goal to each of their job groups or to their entire workforce if the contractor has 100 or fewer employees. Contractors must conduct an annual utilization analysis and assessment of problem areas, and establish specific action-oriented programs to address any identified problems.

PUBLIC SERVICES:

DISID'S Case Management, Information & Referral, and Counseling services may be substantially impacted in terms of additional Social Workers and VR Counselors that are required to meet the additional demand associated with the needs of the military dependents, federal contractors and veterans.

SOCIOCULTURAL ISSUES:

No substantial impacts are projected for DISID under this particular category.

LAND ACQUISITION:

No substantial impacts are projected for DISID under this particular category.

If you have any questions regarding these comments, please contact me at benito.servino@disid.guam.gov (E-mail) or phone 671-475-4646.

Benito S. Servino

Director, DISID